WINDELS MARX LANE & MITTENDORF, LLP

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Special Counsel for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff,

SIPA Liquidation (Substantively Consolidated)

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

AUDAX GROUP LP, AUDAX MANAGEMENT CO. LLC, 101 HUNTINGTON HOLDINGS LLC, MARC B. WOLPOW, GEOFFREY S. REHNERT, and RICHARD T. JOSEPH,

Defendants.

Adv. Pro. No. 10-04651 (SMB)

FOURTH AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: April 30, 2012
- 2. Fact Discovery shall be completed by: October 2, 2015
- The Disclosure of Case-in-Chief Experts shall be due: January 28, 2016 3.
- 4. The Disclosure of Rebuttal Experts shall be due: February 29, 2016
- 5. The Deadline for Completion of Expert Discovery shall be: May 30, 2016
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: July 29, 2016
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: August 12, 2016
- The Deadline for Conclusion of Mediation shall be: December 12, 2016 8.

Dated: New York, New York August 3, 2015

WINDELS MARX LANE & MITTENDORF, LLP

By: /s/ Howard L. Simon Howard L. Simon, Esq. Kim M. Longo, Esq. 156 West 56th Street New York, NY 10019 Telephone: (212) 237-1000

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